SAN ANTONIO DIVISION

# FILED

February 06, 2023

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

S		WESTERN DISTRICT OF TEXTS
,	BY:	NM
		DEPUTY

## DEFENDANT'S OBJECTIONS TO DISMISSAL AND MOTION TO RECONSIDER

#### 1.- Introduction

First, I received no notification of Dkt. 126 NOTICE TO PARTIES in which judge Ezra informed that the case would be dismissed without prejudice if the corporate status wasn't revived.

Second, final judgment has not been entered, a court has the power and ability to reconsider as long as no final judgment has been entered. There are very serious claims being made in this filing. I do understand that I'm not a lawyer, but I truly believe that I am backing up my claims with a preponderance of evidence and that my claims have been proven beyond reasonable doubt.

Third, there is still the counter-claim of non-infringement. On July 21, 2021, the Court granted in part and denied in part Plaintiff's Motion for Partial Summary Judgment as to Defendant's Counterclaims. Among other statements there was: "There is a genuine dispute of material fact concerning the identity of the alleged infringer. As Defendant points out, many courts have held that an infringer cannot be identified from an IP address alone." (Dkt. #97 P. 38) This and other factors resulted in: "Upon considering these facts, the Court finds that this is a genuine dispute of material fact that should be left to the factfinder to decide." (Dkt. #97 P. 40) The order was pretty clear, the non-infringement claim was not won by the Plaintiff in summary judgment. Defendant hereby incorporates that order [Dkt. 97] as if fully stated herein. As it can be seen in Appendix A, my family and I were in Florida from June 10, 2019 through June 30, 2019. We went to Disney World and to the beach afterwards. Any suggestion that I was downloading and sharing any kind of pornography or any other copyrighted content and sharing it in Texas while I was physically in line at Disney World's rides is insane. I know that the Plaintiff doesn't seem to have any issues about watching pornography with a 13 year old (Pelissier Dep. P. 211 L. 17 "... 13-year-old ...") but I consider such actions not just completely inappropriate, but I believe it is illegal for an adult to watch pornography with a child. Even if this court can't do anything about it, or falls outside of the scope of this lawsuit, the Plaintiff violated the law. During the period of

my trip to Florida the Plaintiff claims that 297 titles were downloaded (Appendix B). This court keeps repeating that I don't have enough evidence, yet there is a preponderance of evidence showing that I had nothing to do with what the Plaintiff is claiming happened. The Plaintiff has not provided a scintilla of evidence that would point at me. It is undeniably evident that the Plaintiff is treated very different as compared to the Defendant.

Fourth, a dismissal without prejudice nullifies the ability of California to regulate it's entities. In fact, it provides a precedent for a path to ruin people without any repercussions. With this precedent anybody can open a California LLC., file a bunch of lawsuits, collect settlements, and if/whenever things seem unwinnable, just stop paying taxes and put the company in a suspended status. The precedent being established here is that federal court considers a suspended corporation as able to defend and represent itself, as this court has done for over 2 years by permitting Mr. Beik to litigate the case. Then, an eventual dismissal without prejudice can be obtained if, at the sole discretion of the Plaintiff, the corporate remains suspended. However, what California law establishes is a default judgment if the status is not revived, as the suspended entity can not litigate the case. Based on this court's decision, California is effectively unable to regulate it's corporate entities.

## 2.- Default judgment

By allowing the Plaintiff to stay as a suspended entity with no other effect than a dismissal without prejudice, Mrs. Pelissier has no incentive to pay her taxes. A suspended corporation's lack of capacity to sue or defend itself is meant as a way to pressure the corporation to pay its taxes, not to escape judgment, liability or responsibility. This court has given Mrs. Pelissier extension after extension and allowed Malibu Media LLC. to be suspended for more than 2 years, this is excessively more than a short continuance. Mrs. Pelissier is the only person that controls the status of the corporation. She has had the opportunity to remedy the suspension and has chosen not to do so(<sup>(1, 2)</sup>.

Mrs. Pelissier has not provided a single document to show that even minimal efforts have been taken to remedy the suspension. Mrs. Pelissier's and Mr. Beik's actions directly affected the cost of litigation and what's more, the Defendant is left with very large legal expenses and no way to recover any money. Yet, since a suspended corporation can not defend itself in court a default judgment should have been given in favor of the Defendant.

California Code, Revenue and Taxation Code - RTC § 19719. (a) "Any person who attempts or purports to exercise the powers, rights, and privileges of a corporation that has been suspended pursuant to Section 23301 or who transacts or attempts to transact intrastate business in this state on behalf of a foreign corporation, the rights and privileges of which have been forfeited pursuant to the section, is punishable by a fine of not less than two hundred fifty dollars (\$250) and not exceeding one thousand dollars (\$1,000), or by imprisonment not exceeding one year, or both fine and imprisonment." The intent of the law is clear.

Nobody can argue that Mr. Beik has knowingly represented a suspended corporation for 2 years in a capacity well beyond helping the suspended corporation to be reinstated. Upon learning of the suspension Mr. Beik should have withdrawn from defending the corporation until it was reinstated. The

 $<sup>1\ \</sup>underline{\text{https://www.ftb.ca.gov/help/business/my-business-is-suspended.html}}$ 

<sup>2</sup> https://www.stimmel-law.com/en/articles/suspension-california-corporation-bars-it-using-california-courts

purpose for a reasonable extension is so that the corporation could have been revived. Extensions should not be a 2 year period and then a dismissal without prejudice. Instead, a default judgment is warranted against the suspended corporation in question. <sup>(3)</sup>

Furthermore, Malibu did not produce even a single email from IPP despite promising the Court and Doe that it would produce all of communications with or about IPP—which it testified went well beyond a single email. [E.g., Dkt. 67 pp. 6-7]. The Plaintiff didn't even provide a full contract with IPP. The document provided was missing the whole first section. This failure to meet even the simplest discovery obligations, is a clear violation of Federal Rules of Civil Procedure - TITLE V. DISCLOSURES AND DISCOVERY - Rule 37. Failure to Make Disclosures or to Cooperate in Discovery; Sanctions. After the failure to properly produce documents during discovery, Plaintiff has not even attempted "to supplement or correct the response"

All the reasons above support that the court should enter a default judgment in favor of the Defendant for non-infringement, instead of a dismissal without prejudice in favor of the Plaintiff.

## 3.- Confidentiality levels

Mrs. Pelissier and Mr. Beik have classified critical information, that I need to represent myself as a pro se litigant, as highly confidential, instead of just confidential. This fails to provide a fair environment for my defense. Such classification keeps me from reading documents such as the contract between IPP and Malibu.

The redactions don't even allow me to read the full transcript of Mrs. Pelissier's deposition, having full pages redacted such as (Pelissier Dep. P. 205 - 208, 213 - 215, etc.) as well as many partial page redactions.

Either the confidentiality of the documents needs to be lowered to confidential or the confidentiality agreement modified to allow me access to all the relevant documents.

## 4.- Mrs. Pelissier is the real Plaintiff in the lawsuit

Mrs. Pelissier owns millions of dollars worth of real state. She has had the opportunity and capacity to remedy the suspension and has chosen instead to continue to siphon money out of the suspended corporation, which she continues to operate in violation of California law(<sup>(4, 5)</sup>. Mr. Beik confirmed that Malibu is still conducting business: "Your Honor, my understanding is that their core business is up and running" (Dkt. #124 P.21 L24-25)

Mrs. Pelissier purposefully left the corporation under-capitalized. It is also clear that Malibu Media LLC. is nothing more than Mrs. Pelissier's alter-ego. She is the only member of the corporation, the only director and the only recipient of it's funds. She personally decides who, when and how to file lawsuits.

<sup>3</sup> https://www.yourlegalcorner.com/articles.asp?id=35&cat=corp

<sup>4</sup> https://www.stimmel-law.com/en/articles/suspension-california-corporation-bars-it-using-california-courts

<sup>5</sup> https://www.ftb.ca.gov/help/business/my-business-is-suspended.html

Furthermore, Mrs. Pelissier did register the corporation as the owner of works with the U.S. Copyright Office, but she failed to obtain the copyright from the actual creators of the works: "Q. So do you have any records of anyone who worked on these movies assigning their rights to Malibu Media? A. No." (Pelissier Dep. P. 137 L. 16-19). In the absence of a contract the copyright ownership is assigned to the creators of the work.

When we combine all the above it, is proven beyond any reasonable doubt that she pierced the corporation veil, and that she is personally liable for the actions performed via Malibu Media LLC. Mrs. Pelissier herself is not a suspended entity.

#### 5.- Sanctions

It is deeply disturbing that not one, but two federal judges condone a Plaintiff destroying a decade's worth of records. When we asked for sanctions against the Plaintiff, it was purely based on the fact of the records destruction. A fact that the Plaintiff does not deny. Instead, the court justified not issuing sanctions not based on the action itself, but on the "severity of sanctions" and that the Defendant opposed an extension to the discovery phase. Judge Farrer states: "that a significant extension to the discovery deadline was sought and was opposed by the defendant, but now we're sort of talking about sanctions in connection with, you know, a lack of complete discovery. So the motion's going to be denied on that basis." (Dkt. 74 P. 25 L.14-18) This statement does NOT address the fact that the Plaintiff claimed the **documents they needed to produce were destroyed**. We could have given the Plaintiff a year and they still would not have produced them. Instead, the extension would only produce additional burden and cost to the defense. Why would anyone agree to it? Am I not supposed to defend myself to the best of our ability?

Judge Farrer also stated: "the lack of information here is a concern. The lack of communications produced is a concern. [...] motion for sanctions [...] high burden" (Dkt. 74 P. 24-25). While I am not a lawyer, it is pretty unclear why such destruction doesn't warrant sanctions. Is having the police destroy exculpatory evidence for a defendant charged with murder also to be condoned? That destroying evidence subject to a legal hold happened is not questioned by anybody, only what the proper reaction by the courts is. As far as the court is concerned, there could have been discussions between IPP and Mrs. Pelissier talking about how to select IT professionals for targeting lawsuits (we already know she profiles people with IT knowledge). There could even be a talk on how to fabricate declarations. Mr. Beik likes to say that there is no smoking gun, and yet he is not in a position to make that statement unless he is willing to tell the court that he had access to ALL communications between IPP and Mrs. Pelissier. At what point are sanctions warranted then?

Time and time again we see that Mr. Beik, an officer of the court, knowingly and willfully, makes false statements to the court. During the status conference judge Ezra made the statement: "He's a lawyer. He's not going to lie to me. He's an officer of the court. If he lies to me, there he's really in trouble." (Dkt. #124 P.17 L.18-20) Here, we can establish beyond any reasonable doubt that Mr. Beik knowingly and willfully misled the court.

Even in the event of judge Farrer's decision not to impose sanctions Mr. Beik makes the ridiculous claim that it proves there is no abuse of process: "Defendant continues to make allegations of abuse of process after the substance of those claims have already been found by this Court not to rise to the level of sanctionable conduct. See Dkt. 73 Order Denying Motion for Sanctions. In essence, Defendant is

using a small, technical irregularity to attempt another bite at the abuse of process apple, to multiply the proceedings unnecessarily. Defendant has had his day in court with respect to alleged abuses of process." (Dkt. #95 P.2) Even if we were denied abuse of process, it was not merely due to the lack of sanctions related to the destruction of documents. The lack of sanctions could not be interpreted as a lack of abuse. This is a clear example of how Mr. Beik bends the truth well past any level that can be considered just.

During the 9/6/2022 status conference Mr. Beik made the statement in reference to Malibu's suspension: "I believe it's been less than a year" (Dkt. 124 P. 4 L. 7). Yet, the court and Mr. Beik both were notified by Mr. Morris on 03/09/2021 about the suspension. Later on, we learned that the suspension started on December 1, 2020. He also made reference that the problem was related to an employee: "taken care of for an employee" (Dkt. 124 P. 4 L. 19-20) even though Malibu has no employees. Mr. Beik knew that it had been way longer than 1 year, yet he wanted to mislead the court into believing that it had just been a short while.

On 9/6/2022 he also stated: "Your Honor, all counterclaims are gone. Every one was dismissed on summary judgment." (Dkt. 124 P. 6 L. 22-23), yet the counterclaim of **non-infringement was not denied and is still active**. Mr. Beik clearly intended, and succeeded, in convincing the court that I had to right to ask for much: "[...] because you don't have any counter-claims. So the question is how much money are you willing to pay them?" (Dkt. 124 P. 7 L. 13-15) The court only talked to Mr. Beik, not considering anything I had to say.

Even when Mr. Beik was clearly and precisely asked during the status conference: "Mr. BEIK: Yes, Your Honor, Judge Farrer ruled and granted our summary judgment to dismiss all of the counterclaims. THE COURT: And he appealed that and I affirmed the – MR BEIK: You affirmed it. THE COURT: So you got two judges, not just me." (Dkt. #124 P.11 L.22-25, P.12 L.2)

On July 21, 2021, the Court granted in part and denied in part Plaintiff's Motion for Partial Summary Judgment as to Defendant's Counterclaims and Affirmative Defenses (Dkt. #97). The court made it clear that the **noninfringement counter-claim was to proceed to trial**: "There is a genuine dispute of material fact concerning the identity of the alleged infringer." (Dkt. #97 P. 38) and "Upon considering these facts, the Court finds that this is a genuine dispute of material fact that should be left to the factfinder to decide." (Dkt. #97 P. 40) The court ignoring it's own orders and just taking the word of Mr. Beik is unconscionable.

In the ORDER DENYING PRELIMINARY INJUNCTION (Dkt. #106 P.3 footnote 3) judge Ezra made a reference that "the parties resolved many of the disputes". However, this is not completely correct. Some were properly resolved, but some of the "resolutions" were promises by Mr. Beik that he would produce certain documents and fix certain deficiencies. These documents were never produced. This has effectively denied my right to conduct discovery.

With the original declaration presented in the court being dated in 2015 the communications from 2015 were specially important. Furthermore, this court had first hand knowledge of communications between IPP and Malibu Media. Mr. Beik listed 47 lawsuits (Dkt. #6) in this very court. He has also filed similar lawsuits in other Texas courts. Yet, not a single document from IPP other than the one declaration in this lawsuit and a partial contract has been produced. Not even the email that should have contained as

an attachment Mr. Fieser's declaration, not even the other 46 declarations. Mr. Beik continues to make a mockery of the rules and yet he is allowed to break the rules with impunity.

In the order dated July 21, 2021, judge Ezra once more made reference to the Plaintiff's sub-genre claim as one of the material facts why the Plaintiff's claim of infringement was moving forward: "Further, according to Plaintiff's Rule 30(b)(6) deposition, the titles downloaded by Defendant's IP Address over the course of almost two years all match the same sub-genre." (Dkt. #97 P.39) . Yet, it is a known fact that the sub-genre claim was false. Mrs. Pelissier and Mr. Beik both had access to evidence that disproved it (Appendix B).

Mr. Beik's statement in reference to the "sub-genre" selection of titles that were "downloaded" was introduced as a material fact. Mr. Beik uses Mrs. Pelissier's deposition to establish it as a fact: "All of the nine films infringed by Defendant fit into the same sub-genre", (Dkt. #66 P.4 (b.6)). While the Plaintiff refused to provide access to the 9 films in question (not even the parts they claimed were downloaded from my network) there is nothing in the titles to suggest this is true. Only 4 out of 9 titles could be considered part of the sub-genre. If we look at some of the titles provided by Mr. Beik himself (Appendix B has a subset of the titles from produced file: Malibu 001427 - WTX40-70.121.72.191-Additional Evidence.xlsx) we see titles like: "Blaze Of Glory Lyrics...", "Ronald Reagan An Intellectual Biography...", "The Sims 4RELOADED", "CyberLink PowerDVD Ultra ...", "Adobe Flash Professional CC 1311 [WiN64] [MAC]". Not only does this completely destroy the claim of sub-genre but why in the world would I download windows and Mac software when I don't use those operating systems? The spreadsheet provided by Mr. Beik shows movies, tv series, books, music, software and things that can't even be described (what is "7492554ts"?). The list covers languages that I don't speak nor a way to understand what those files might be. How did Mr. Fieser get authorization to download all these files? I can understand him downloading files that his clients have authorized, but why is he allowed to commit massive infringement by downloading any movie, series, books and software he feels like? Is this really what the court considers following the standard process? If anything, the spreadsheet of titles is exculpatory in nature for the Defendant and accusatory for the Plaintiff and IPP.

Mr. Beik's efforts to mislead don't stop there. Even during the 9/6/2022 conference it was clear that judge Ezra still had some confusion on whether or not IPP ever connected to my network. When I brought it up: "They have said under penalty of perjury that IPP never connected to my network or computer systems" (Dkt. 124 P. 9 L. 18-19). The key here is that Mrs. Pelissier denies IPP ever connected: "Q. And how specifically does – how specifically does that work? Does IPP connect to people's IP addresses? What is the – A. No, it connects -- it doesn't -- no one connects directly." (Pelissier Dep. P. 39 L. 3-7) Mr. Beik has played both sides, he stated the connection took place and later he denied that such connection ever took place. Mr. Fieser's declaration claims that the connection did in fact happen: "Upon review of IPP's forensic activity logs, I determined that IPP's forensic servers connected to an electronic device using IP Address 70.121.72.191." (Dkt. #5 P. 47 (9.)). More importantly, On 9/6/2021 Judge Ezra stated: "That is not accessing your network" (Dkt. #124 P.10 L.14) and yet judge Ezra acknowledges the connection stated above in his order dated 7/21/21: "Plaintiff's investigator, Tobias Fieser, stated in his declaration that "IPP's forensic servers connected to an electronic device using IP Address 70.121.72.191" (Dkt. #97 P. 39). I understand judges may not be technical nor have deep knowledge of networking and protocols, but it is clear the court is confused as to what the Plaintiff claims and what they did as a matter of fact. This proves that the Plaintiff was indeed successful in misleading the court. While the court may not agree with me, I have a feeling that

the Plaintiff's denial is due to the up to 15 years in prison that the Plaintiff and/or her agent may face due to the unauthorized access to my networks. But that's a different issue outside this case.

The court used Mr. Fieser's declaration to issue a subpoena. It also used the "fact" that IPP connected to my network to move the case forward. With the Plaintiff and the Plaintiff's lawyer denying the connection ever took place. Either Mr. Fieser or Mrs. Pelissier committed perjury, the evidence is clear and doesn't leave much room for interpretation. The statements each of them made had an intent to lead the court in a particular direction, at least one of the statements was false. This is not a simple matter of me and the Plaintiff disagreeing and having multiple versions of what the facts might be, as judge Ezra said during the status conference. This is the Plaintiff's lawyer, with full knowledge, claiming both as truthful even though they contradict each other.

Mr. Beik had clear knowledge of this, since he personally made the statement and filed Mr. Fieser's declaration, yet he once again mislead the court. When judge Ezra asked: "Do you know what he's talking about when he said they said both things?" Mr. Beik replied: "No, Your Honor, I have no idea." (Dkt. #124 P. 10 L.24-25, P. 11 L. 1) Once again we see a clear intent to mislead. I wasn't allowed to go to the record to prove it, therefore it has been proven here beyond reasonable doubt.

Then comes the ownership of the copyrighted titles in the first place. How can I, or anybody else, infringe on Malibu's copyright when **Malibu does not own the films** in the first place? As per Mr. Beik's statement: "Plaintiff has agreed to produce all assignments. Plaintiff represents that the Copyrights in Suit have never been assigned and it is not in possession, custody, or control of any responsive documents or information." (Dkt. #42 P. 2 (3)) It is also stated in section 4 that Mrs. Pelissier knew that no copyright assignment was in place (Pelissier Dep. P. 137 L. 16-19)

At what point **do the rules and laws apply to Mr. Fieser, Mrs. Pelissier and Mr. Beik?** It is impossible for a Defendant to litigate in fair terms when the Plaintiff and her counsel are above the law. There is a preponderance of evidence, all of it is in the docket. It is a fact that Mr. Beik successfully misled a senior federal judge. It is also a fact that Mr. Beik has been representing a suspended California corporation for more than 2 years even though it is against California law. I can't even convince the court to look at the evidence. I don't see how any legitimate court can claim that I'm receiving fair treatment or worse, claim that what's happening here is in the interest of justice.

### 6.- Motion to reconsider

Final judgment has not been entered. The level of injustice being proposed by a dismissal without prejudice is appalling. Is as if I have no rights in this court. Mrs. Pelissier, Mr. Beik and Mr. Fieser can do anything, including breaking the rules and violating California and Federal laws with impunity.

Time and time again judge Ezra has sent a clear signal to the Plaintiff that they wouldn't be subject to pay even all my legal fees regardless of the outcome. As early as 8/3/21: "although Defendant complains about the amount of fees he has spent litigating this case, he is not blameless" (Dkt. #106 P. 10) and as late as 9/6/2022 during the status conference: "So the question is how much money are you willing to pay them?" (Dkt. 124 P. 7 L. 14-15). Judge Ezra didn't even consider the fact that mediation could give a result against the Plaintiff. The reason why I'm currently not represented by a lawyer is precisely judge Ezra's statements. I understand I'm at the mercy of the court when it comes to fees, but why would a judge deny such fees in this case? I have done everything possible to keep costs down, but

the Plaintiff's behavior has made it very difficult. On 12/4/2019 I made a sincere offer to the Plaintiff in which I would absorb the costs incurred to date and pleaded with her to reconsider moving forward, considering that I did not download or share her films. It would have costed \$0 for her to settle. Yet with no evidence whatsoever, she stated that they had done an investigation and moved forward. To date, no documents from any investigation other than the original declaration from Mr. Fieser have been produced. It was the Plaintiff's decision to continue the lawsuit and behave in a manner as to increase the costs prohibitively, for no good reason and without cause, that has brought us to this point. The court should take that into consideration. Isn't this what Federal Rule of Civil Procedure 68 is for? I understand there are nuances here but the Plaintiff clearly acted in bad faith. She should not be rewarded for it.

How much evidence is required to show harm? When judge Ezra said "the evidence didn't establish it" (Dkt. #124 P.9 L. 1-2), yet I have clearly stated that I had to treat Mr. Fieser's claim as a security incident and spent 3 weeks reinstalling all machines from scratch and restoring services. The claim by Mr. Fieser caused severe mental anguish due to the possibility of access to protected data by an unauthorized person. I suffered from extreme stress due to the possibility of having been hacked. In 2017 I was working with a dataset from the Department of Homeland Security, my work also involved having access to information related to the Department of Defense and covered under the International Traffic in Arms Regulations (ITAR). Mr. Fieser does not seem to be a US person as defined by the United States government. These, in addition to health records, financial statements, social security numbers from tax filings and trade secrets from small and Fortune 100 companies. The additional time having to use my hands to restore services rather than resting caused pretty severe pain. If I wanted to use my hands during that time I would have done so in billable hours, so if the physical pain and mental anguish are not considered harm then Mr. Fieser's claim would have resulted in revenue loss. I have an MRI, X-rays, thousands of dollars in medical bills and months of physical therapy that resulted from it. How much more evidence is needed? Larger companies like Colonial Pipeline are allowed to claim losses due to unauthorized access. I understand my company may be a small one, but to be denied that such a preponderance of evidence doesn't establish harm is to deny reality. The act of accessing protected networks without authorization is enough to show harm beyond a reasonable doubt. As I stated: "That's not just a defense, it's proof that there was harm" (Dkt. #124 P.9 L.12-13) If such action is not harmful then anybody has the right to connect to any network as long as they claim they are looking for copyrighted works. I write copyrighted software, does that give me the right to access the President's computer? Judge Ezra has mentioned that it is just a matter of following the process to a normal outcome. The causation has been established, nobody denies it. So the only issue left is whether or not this is normal use of the legal process. No legal process can authorize the access of a 3<sup>rd</sup> party to a protected computer network. If that was the case no laws related to hacking would be enforceable. The Plaintiff stated that they had access to all the files in the computer. The Plaintiff has not produced a single packet of data that they claimed to have downloaded. How many other Plaintiffs file copyright infringement cases yet don't produce a single piece of data? This is not following the normal process to its just outcome.

It has been shown and demonstrated beyond any reasonable doubt via Mrs. Pelissier and Mr. Beik's own filings that the Plaintiff herself and that IPP, as part of conducting its business, committed massive copyright infringement. It has been shown and demonstrated beyond any reasonable doubt that Mr. Beik knowingly and willfully misled the court in multiple occasions. The court has been used as a weapon to demand payments from Defendants for movies that Malibu doesn't even own. There is no reasonable jury of my peers that would likely consider this as the reasons why courts were established.

A jury of my peers would no doubt consider this abuse of process, yet I'm told that all of this is not egregious enough to even present it to a jury. It seems that it is more common for a jury to decide the fate of another human being in matters of life and death. This is a clear example of an industry that is not regulating itself and yet there is nothing I can do.

#### 7.- Conclusion

I may not be a lawyer, but I do know how to read. Even with my limited vocabulary I can see and understand clearly gross violations of the law by the Plaintiff and her agents. I have not waived my rights, yet they are not being considered.

This court has demonstrated an incredible level of bias benefiting the Plaintiff, whether conscious or unconscious it doesn't matter. Again, I have not waived my rights. Because of due process, I am supposed to have rights to an impartial judge/jury and a fair trial. I am trying to be respectful of the court, but being respectful to the court and to the rule of law does not mean that I should quietly accept an injustice of this magnitude. Yet this is what is being suggested by judge Ezra: "So the question is how much money are you willing to pay them?" (Dkt. #124 P.7 L.14-15). When the Plaintiff misleads the court the way they have done here, the court ignoring my rights and rewarding the Plaintiff with a dismissal without prejudice while ignoring California law, as well as federal rules and laws, is completely unacceptable.

So far, these are some of the rights I'm being denied: a presumption of innocence, access to discovery, equitable relief, access to a jury, the right to apply California law on a California corporate entity, the right to a default judgment, sanctions against an officer of the court that made false statements and misled the court, sanctions against a Plaintiff that destroyed 10 years of records, the ability to even read the unredacted Plaintiff's deposition and productions needed as a pro se litigant.

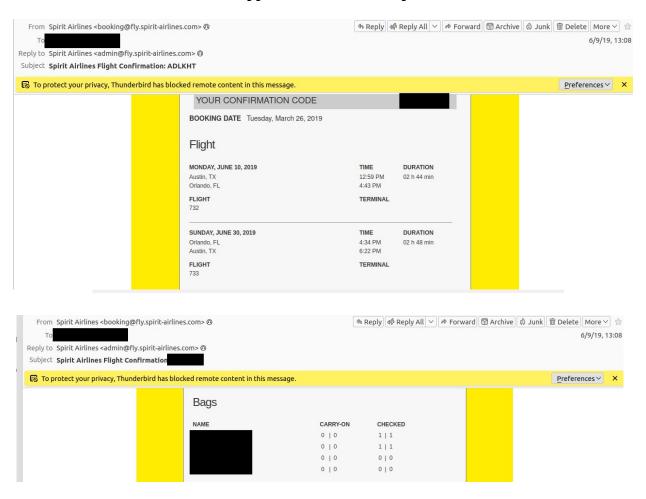
How does this court claim that I don't have any counterclaim? Just because Mr. Beik said so? When I tried to go to the record I was told: "that's for the trial" (Dkt. #124 P.11 L.5-6). If the court is not willing to even look at the record and its own decisions, and instead trusts whatever Mr. Beik says, it means that we have lost the judiciary. It is clear the court didn't want to hear from me or to consider the facts of the case.

With respect to what the Defense stated as some of the incorrect decisions (the evidence is clear here with regards to the harm and abuse of process) I'm told: "You can take care of that on appeal" (Dkt. #124 P.7 L.4) Then, I'm given a lecture on how the appeal is a very expensive process and that the Court of Appeals is deluged with work. Yes, I understand that this case is not that important compared to other cases, but there should be no more important duty for a Court of Appeals that to ensure the lower courts are following the law. Perhaps the judge presiding considers this case beneath him. If that's the case then a recusal is warranted.

The court made a reference to Abraham Lincoln calling the federal court a temple of justice. All I'm asking is for the court to please look at the evidence and apply the applicable laws. I shouldn't have to even ask. There is a preponderance of evidence against Mrs. Pelissier, Mr. Fieser and Mr. Beik, yet there is no single piece of evidence against me. Only an accusation in a declaration with a tainted chain of custody (Plaintiff can't even produce the email that included the declaration and the declaration itself is dated 2015 even though it talks about 2017-2019), without a single piece of data and without any

document to support the Plaintiff's allegations. In fact, the Plaintiff herself discredited the afore mentioned declaration. Let the reference to a temple not be equivalent to how the Catholic church had bishops (the equivalent to judges?) ignore for decades how the priests (the equivalent to lawyers?) abused the parishioners (the equivalent to citizens/residents?). This court should not protect those that have violated the law for so long.

## **Appendix A: Florida Trip**



# Appendix B: Malibu 001427 - WTX40-70.121.72.191-Additional Evidence rows during FL trip

1 Hit Date UTC	Filename	5406/15/201	9 Download Runtime GetDataBack Simple 410 Portable FULL torrent
	Creampie Cuties 8 Anal Creampie Doghouse Digital XXX DVDRip NEW 2019		9 ParkerPlaysS02E01720pWEBx264TBS
	WakeUpNFuckE219AidraFoxXXX1080pMP4BIUK Fresh Outta High School 3 XXX Digital Sin WEB DL Split Scenes 2007		9 Sveriges Baumlsta Rockabilly 2018 9 JulesJordan Veronica Avluv and Ziggy Star Drink Each Others Squirtgasms We Hope Manuel Ca
	BurningAngel171026StacyJayXXX1080pMP4KTR		9 Wikimedia incremental dump files for the Bulgarian Wikisource on September 17 2016
	LuciferS02E11HDTVx264LOLrarbg		9 DoWomenHaveAHigherSexDrive2018WEBRipx264ION10
	GlaryUtilitiesPro5940116rar		9 Sticks and Stones 1996 WEBRip x264RARBG
806/15/2019			9 Autodesk Inventor 20082009 Video Tutorial Series From 4D Technologies AzLoX
	BirthofaMovement2017PWEBDLRipKOSHARAavi KingsofKtown2017WEBRipx264RARBG		9 Judge Rinder S03E10 720p WEB h264KLINGON [eztv] 9 Carrie Underwood Blown AwayH264AAC360pmp4
	ОИ2018ЛыжиМуж50кмКлассСтильФлудилкагрупп24022018Первыйmkv		9 VA Песни Александра Непомнящего [flac]
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Dated: February 5, 2023

Respectfully submitted,

/s/ John Doe John Doe jd6905788@gmail.com

## **CERTIFICATE OF SERVICE**

I hereby certify that on February 5, 2023 I electronically filed the foregoing documents with the Court using its official dropbox, and served on the same day all counsel of record by email.

<u>/s/ John Doe</u> John Doe